

560-06/MEU/PLS
FREEHILL HOGAN & MAHAR, LLP
Attorneys for Plaintiff
Titan Maritime Ltd.
80 Pine Street
New York, NY 10005
(212) 425-1900
(212) 425-1901 fax

Michael E. Unger (MU 0045)
Pamela L. Schultz (PS 8675)

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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TITAN MARITIME LTD.,

Plaintiff,

06 CIV 13505 (JSR)

NOTICE OF MOTION

-against-

ROTOMAC EXPORT PVT LTD. OF
KANPUR, INDIA a/k/a ROTOMAC
EXPORT PVT LTD., and
FROST INTERNATIONAL LTD.,

Defendants.

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SIRS:

PLEASE TAKE NOTICE that Plaintiff TITAN MARITIME LTD. ("TITAN"), by its attorneys Freehill Hogan & Mahar, LLP, upon the annexed Unger Affirmation, Watson Declaration, the exhibits annexed thereto, the accompanying Memorandum of Law, and the pleadings and proceedings previously had herein, WILL MOVE THIS COURT, before the Honorable Jed S. Rakoff, United States District Judge, at the United States Courthouse for the Southern District of New York, 500 Pearl Street, Courtroom 14-B, New York, New York, at a time and place to be established by the Court, for an Order recognizing and confirming the arbitral award rendered in London, England as a

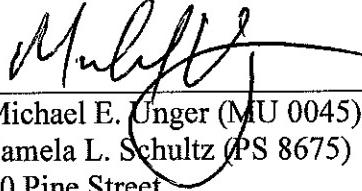
Judgment of this Court, together with such other, further and different relief as the Court may deem just and proper in the premises, including but not limited to an award of attorneys fees and costs incurred in enforcement of the arbitral award.

PLEASE TAKE FURTHER NOTICE that opposing papers, if any, must be served so as to be received by Plaintiff's counsel no later than the close of business on November ___, 2007, and that reply papers, if any, must be served so as to be received by Defendant's counsel no later than the close of business on November ___, 2007.

Dated: New York, New York
November 1, 2007

FREEHILL HOGAN & MAHAR, LLP
Attorneys for Plaintiff
Titan Maritime Ltd.

By:



Michael E. Unger (MU 0045)
Pamela L. Schultz (PS 8675)
80 Pine Street
New York, NY 10005
(212) 425-1900
(212) 425-1901 fax

TO: Rotomac Export Pvt. Ltd.
201 City Centre 63/2
The Mall
Kanpur, India 208004

Frost International Ltd.
492 Kalpna Plaza 24/147-B
Birhana Road
Kanpur U P, India 208001